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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

130393

SUBJECT: Publicker-Industries Site
\$2,000,000 Exemption Addendum

DATE: APR 6 1988

FROM: David P. Wright, Senior OSC *Edward M. Powell for*
Emergency Response and Preparedness Section (3HW22)

TO: Dr. J. Winston Porter, Assistant Administrator
Office of Solid Waste and Emergency Response (WH-562A)

THRU: James M. Seif *J. M. Seif* & Stephen R. Wassersug, Director *S. R. Wassersug*
Regional Administrator (3RA00) Hazardous Waste Management Division (3HW00)

I. Purpose

Per your request of March 29, 1988, the OSC is submitting an additional clean-up option for your review and consideration. This memo should serve as an addendum to the previously submitted \$2,000,000 exemption.

II. Background

The option being offered in the addendum is in addition to the six options already presented in the preceeding document. For all intents and purposes we will consider this option #7.

Option #7 as proposed involves continuing the on-going removal action to the point of arranging for and conducting the transportation and disposal of most major waste streams on-site. PRP's will then be given an opportunity to perform the necessary disposal. Should disposal by FRP's be unattainable other alternatives for doing so will be considered and recommended by the OSC, including using the remedial or removal programs. The OSC may then have to submit an additional funding request to address the transportation and disposal aspects of the project.

III. Proposed Option

A. Description of option #7 is as follows:

1. All wastes in tanks, pipelines, drums and other vessels will be consolidated, bulked and stored on-site. This may entail tank testing and repair as well as other structural modifications to the site.
2. Compatibility testing of all waste streams to ensure proper bulking.
3. Disposal of some priority waste streams (such as flammables, acids, etc.).

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4. Asbestos assessment with possible limited removal or encapsulation.
5. Addressing of piping and materials contained therein.
6. Fire watch and security during the performance of this option.

NOTE: All work and costs incurred are based on a three month time frame.

The preliminary estimate for this option is \$5,500,000. You have already approved an additional \$1,300,000 in extramural clean-up costs, via your temporary approval dated March 11, 1988. Therefore, only \$4,200,000 in extramural clean-up costs would be needed to carry out the option.

IV. Costs for Proposed Action

Proposed Costs

Current Ceiling

ERCS	\$2,795,000
TAT	224,000
EPA	96,000
USCG	10,000
EPA/Indirect	202,000
Total Ceiling	\$3,327,000

Requested Additional Funds

ERCS	\$4,200,000
TAT	50,000

15% Contingency (ERCS and TAT Costs)	637,500
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Total Extramural Costs	\$4,887,500
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EPA Direct Costs	25,000
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Total Project Funding Request	\$4,912,500
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Current Ceiling	\$3,327,000
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New Total Project Ceiling	\$8,239,500
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NOTE: Above figures do not include security/fire watch costs beyond the estimated three (3) month time frame.

V. Regional Recommendation

I recommend that you approve the \$2 million exemption request for the Publicker Industries site because conditions at the site meet the National Contingency Plan, 40 CFR Section 300.65(b)(2), and CERCLA Section 104(c) Criteria for a Removal. Your approval will raise the total project ceiling from \$3,327,000 to \$8,239,500 of which \$6,995,000 are for extramural clean-up contractor costs.

You may indicate your approval or disapproval by signing below:

Approval

John L. G.

Date

4/8/88

Disapproval

Date

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 6 1988

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Region III's \$2 Million Exemption and Ceiling Increase Request
For Continuation of Removal Activities for the Publicker Industries
Site, Philadelphia, PA --- TRANSMITTAL MEMORANDUM

FROM: Timothy Fields, Jr., Director
Emergency Response Division

THRU: Henry L. Longest II, Director
Office of Emergency and Remedial Response

TO: J. Winston Porter
Assistant Administrator

Attached is a request from the Region III Regional Administrator for a ceiling increase of \$4,912,500 to continue removal actions at the Publicker Industries site. If approved, the total project ceiling will be raised to \$8,239,500, of which \$6,995,000 is for extramural cleanup contractor costs. Also attached is the Publicker Industries Site, Philadelphia, PA, \$2M Exemption Request memorandum, dated March 11, 1988, documenting your authorization for the Region to expend \$1,375,000 above the \$2 million limit to continue onsite activities until the original exemption request was processed.

The Regional exemption request and addendum will provide funds to stabilize this site, not to perform a complete cleanup. The proposed actions, described in option number seven, include addressing the fire and explosion threats, leaking tanks and piping, migration of hazards into the Delaware River, and the bulking of chemical wastes. The Region will stabilize materials and seek disposal through the issuance of 106 orders to potential responsible parties.

The option being recommended by the Region is consistent with your direction at the March 29, 1988, briefing on this site. We recommend that you approve this request by signing the April 6, 1988, Addendum to the Region's Action Memorandum.

Attachments

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